

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VIAVIEW, INC.

Plaintiff,

vs.

BLUE MIST MEDIA; ERIC S. CHANSON;
KEVIN C. BOLLAERT; CODY ALVIAR; ROY
E. CHANSON; and AMY L. CHANSON,

Defendants.

Case No. 2:12-cv-01657-LRH-GWF

**AFFIDAVIT OF RONALD D. GREEN IN
SUPPORT OF *EX PARTE* MOTION FOR
TEMPORARY RESTRAINING ORDER
AND MOTION FOR PRELIMINARY
INJUNCTION**

I, RONALD D. GREEN, do hereby affirm under penalty of perjury:

1. I am over the age of eighteen (18) years and am a resident of the State of Nevada. I
serve as counsel for ViaView, Inc.

2. I have personal knowledge of the facts contained herein, and if called as a witness,
could testify competently thereto.

3. I have researched and observed the website <isanyoneup.net> operated by the
Defendants. Currently, this website redirects to <yougotposted.com>. I have also researched and
observed this website.

1 4. Upon information and belief, neither <isanyoneup.net> nor <yougotposted.com>
2 contains information in compliance with the record keeping requirements under 18 USC § 2257.

3 5. Upon information and belief and based upon telephone conversations with Eric
4 Chanson and Cody Alviar, neither <isanyoneup.net> nor <yougotposted.com> obtains or even
5 attempts to obtain consent from the individuals featured on their website. Defendants do not get
6 permission to link to the subject's Facebook pages, nor do they verify the ages of their subjects.
7

8 6. On several occasions, I communicated with Eric Chanson and his parents, Roy E.
9 Chanson and Amy L. Chanson.

10 7. My discussions with Eric Chanson sought to cure the dispute rather than filing for
11 litigation. My client, ViaView, Inc., offered to purchase the domain name from the Defendants for
12 a cost well above the actual value of the domain or the value of any other reasonable
13 considerations.
14

15 8. Eric Chanson informed me, during the discussions attempting to broker the deal
16 allowing my client to purchase the domain, that he was aware of <isanyoneup.com>, aware of the
17 fact that it was sold to my client, and aware of my client's ownership of the name. In fact, Eric
18 Chanson said that they chose the domain names because they were aware of the manner in which
19 the <isanyoneup.com> domain was used prior to my client's acquisition of the domain. Eric
20 Chanson also informed me that Blue Mist Media also owned <isanyoneupvideos.com> and
21 <isanyoneupnudes.com>.
22

23 9. I transmitted a proposed settlement agreement to Eric Chanson. His mother
24 informed me that Eric Chanson received and executed the agreement, but that his fax machine was
25 broken and he was unable to return the agreement to me. To date, we have not received a signed
26 copy of the agreement.
27
28

10. I then spoke with Eric Chanson and his parents, Amy L. Chanson and Roy E. Chanson. They informed me that Mr. and Mrs. Chanson were not only aware that their son ran the <isanyoneup.net> website, but that they had assisted him with editing duties on the website.

11. Based upon my conversations with Mr. and Mrs. Chanson, I believe that they convinced their son to set aside the agreement he had already executed and refuse to complete the agreed upon sale of the domain.

12. At this point, ViaView filed suit against the Chansons and the other representatives responsible for <isanyoneup.net>. Upon commencement of the suit, the Defendants redirected <isanyoneup.net> to <yougotposted.com>. Prior to the suit, <isanyoneup.net> did not redirect.

13. After Cody Alviar was provided with a waiver of service package, his mother, Stephanie Logan, contacted me. After numerous conversations with her and Mr. Alviar, they consented to provide to us Skype chat transcripts between Mr. Alivar, Mr. Bolleart and Mr. Chanson. True and correct copies of these materials, as they were sent to me, are attached to the instant motion as Exhibit 1.

Dated this 13 day of November, 2012 in Las Vegas, Nevada.

Ronald D. Green

State of Nevada
County of Clark

This document was signed before me on November 13, 2012, by Ronald D. Green, who provided his driver's license as proof of identity.

Erika E. Dillon, Notary Public

